



DEPARTMENT OF DEFENSE  
DEFENSE PRIVACY AND CIVIL LIBERTIES DIVISION  
241 18<sup>TH</sup> STREET SOUTH, SUITE 101  
ARLINGTON, VA 22202-3405

April 7, 2015

MEMORANDUM FOR THE DEFENSE FINANCE AND ACCOUNTING SERVICE  
PRIVACY OFFICE

SUBJECT: Justification for the Continued Use of Social Security Numbers in Corporate Electronic Document Management System (CEDMS)– Accepted

Thank you for completing your review of Social Security Number (SSN) use within your system. After review, the Defense Privacy and Civil Liberties Division has accepted your justification for continued use of the SSN for the purpose of (4) Interactions with Financial Institutions (7) Federal Taxpayer Identification Number and (8) Computer Matching. **Further review of this system will not be required under DoD's current SSN Reduction plan.** While this system has been identified as still requiring collection, maintenance, and use of the SSN, you must continue to ensure that this data is afforded the highest protections practicable through use of appropriate administrative, technical and physical safeguards. Please maintain a copy of your justification and this memo in your records.

If you have any questions, please contact Mr. Brent Bice at (703) 571-0070 or e-mail [brent.j.bice.civ@mail.mil](mailto:brent.j.bice.civ@mail.mil).

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William L. Erwin  
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## DEFENSE FINANCE AND ACCOUNTING SERVICE

8899 EAST 56<sup>TH</sup> STREET  
INDIANAPOLIS, IN 46249-0201

DFAS-ZT

February 25, 2015

### MEMORANDUM FOR DEFENSE PRIVACY AND CIVIL LIBERTIES OFFICE

SUBJECT: Justification for the Use of the Social Security Number (SSN) and/or Tax Identification Number (TIN) – Corporate Electronic Document Management System (CEDMS)

The DFAS employs a system called CEDMS, to collect, store and maintain various types of hard copy source documents to include vouchers (e.g., schedules of withdrawals & credits, vouchers for transfer between appropriations and/or funds, journal and cash collection vouchers, military pay vouchers, public vouchers for refund and debit vouchers) and disbursements (e.g., statement of accountability, schedule of canceled or undelivered checks), form DD2875, contracts, litigation and other miscellaneous documents for the Department of Defense (DoD) and DFAS. Its primary function is to store financial information which can be retrieved for evidentiary audit support, and certification on payments and collections. This data contains SSNs and TINs required for payment, collection and tax reporting purposes. The last signed Privacy Impact Assessment performed as part of the accreditation process was completed and signed on September 21, 2012.

The justification for the use of the SSN and/or TIN is DoDI 1000.30, Enclosure 2, Paragraph 2.c. (4) "Interactions with Financial Institutions," (7) "Federal Taxpayer Identification Number," and (8) "Computer Matching." Financial institutions may require that individuals provide the SSN as part of the process to open accounts. It may therefore be required to provide the SSN for systems, processes, or forms that interface with or act on behalf of individuals or organizations in transactions with financial institutions.

The authority for this DoD information system to collect, use, maintain and/or disseminate Personally Identifiable Information is found in the following: 5 U.S.C. 301, Departmental Regulations; Department of Defense financial Management Regulations, Chapter 20; 31 U.S.C. Sections 3511, 3512 and 3513; and E.O. 9397 SSN as amended. The System of Records Notice identifier for this system is T7300c, while the DoD IT Portfolio Repository identifier for this system is 19 Electronic Commerce/Electronic Data Interchange.

Justification for the use of the SSN and/or TIN does not constitute blanket permission to use such data. The CEDMS application supports payment, collection and reporting for DoD components. The SSN and TIN must continue to be collected and stored in order to disburse payments, process collections and handle tax reporting requirements established by the Internal Revenue Service. The system in question,

[www.dfas.mil](http://www.dfas.mil)

CEDMS, has established user roles and access procedures that safeguard the SSN and TIN.

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Director, Information and Technology

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